

## **EXHIBIT 4**

**In re: MOTORS LIQUIDATION COMPANY, et al.,  
f/k/a General Motors Corp., et al., No. 09-50026**

**Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition  
Testimony of Keith Martorana and the GUC Trust and New GM's Objections Thereto**

Keith Martorana November 20, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
9:21	11:14	
12:9	13:15	
13:17	14:10	
23:11	23:15	
23:19	23:20	
25:11	25:16	
25:19	25:25	
26:4	27:1	
27:6	27:19	
32:11	33:25	
35:9	35:12	
35:15	36:4	
36:11	36:12	
37:11	38:7	
38:16	38:18	
38:22	39:15	
39:18	43:6	
43:10	43:13	
51:25	52:2	
52:5	53:19	
53:24	54:4	
58:2	60:2	
60:16	61:8	
66:21	67:7	
67:18	68:3	
68:17	69:9	
69:11	69:19	
71:1	72:22	
73:17	73:20	
74:4	74:12	
75:21	76:8	
76:14	77:8	
83:9	83:23	Relevance.
84:16	85:15	Relevance.

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
85:22	86:1	Relevance; Incomplete quotation; Lack of foundation (FRE 602).
86:11	88:4	Relevance (86:11-88:4); Incomplete quotation; Lack of foundation (FRE 602) (86:11-25); Mischaracterizes testimony (88:1-4).
88:8	88:10	Relevance; Lack of foundation (FRE 602); Mischaracterizes testimony.
92:14	92:19	Lack of foundation (FRE 602); Mischaracterizes testimony.
92:24	93:2	Lack of foundation (FRE 602); Mischaracterizes testimony.
103:22	104:1	
104:5	104:6	
106:19	106:25	
107:4	107:10	
107:18	107:22	
108:1	108:6	
109:15	109:24	
110:6	110:8	Lack of foundation (FRE 602); Mischaracterizes testimony; designation is incomplete (it begins half-way through the witness' answer).
111:14	112:14	Attorney colloquy; Lack of foundation (FRE 602) (112:12-14).
112:16	112:19	Attorney colloquy; Lack of foundation (FRE 602).
112:23	113:25	Mischaracterizes testimony (113:19- 25).
114:5	114:10	
115:15	116:9	
116:13	116:14	
116:17	116:21	
118:7	118:13	
123:23	124:7	
125:17	125:20	
125:25	125:25	
126:13	126:16	
126:20	128:10	

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
128:14	129:2	
129:6	129:25	
130:5	130:23	
131:19	132:7	Lack of foundation (FRE 602); Mischaracterizes testimony (132:3-7) .
132:10	132:20	Lack of foundation (FRE 602); Mischaracterizes testimony.
133:12	133:15	
134:20	135:25	
141:22	142:7	
148:25	149:12	
149:15	149:18	
155:7	155:11	
176:17	178:6	
178:20	179:23	
183:23	183:25	
184:4	184:19	
184:23	184:23	
194:14	196:1	Lack of foundation (FRE 602); Mischaracterizes testimony; Calls for speculation (195:23-196:1).
196:9	197:8	Lack of foundation (FRE 602); Mischaracterizes testimony; Calls for speculation (196:9-12).
197:11	197:19	
200:21	200:22	
204:5	204:6	
216:8	216:9	
235:14	235:22	
236:1	236:23	

**GUC Trust and New GM's Counter Designations of the Deposition Testimony of Keith Martorana and the Plaintiffs and Participating Unitholders' Objections Thereto**

<b>Keith Martorana November 20, 2017</b>		
<b>GUC Trust and New GM's Counter Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections to Counter-Designations</b>
<b>Counter-Designation Begin</b>	<b>Counter-Designation Designation End</b>	
14:12	14:22	
27:21	28:4	This is not a valid counter-designation, as neither completeness or fairness requires that this designation be considered contemporaneously with the designations (FRE 106); Hearsay (801, 802)
35:13	35:14	Improper designation of counsel objection
36:9	36:10	Improper designation of counsel objection
60:3	60:13	
73:21	74:2	
78:12	79:4	First off, this is out-of-context and incomplete in and of itself (106); second, even if it were "complete" by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); hearsay (801, 802); lacks foundation/ personal knowledge (601, 602); speculation/ vague and ambiguous.
79:15	80:14	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation / personal knowledge (601, 602); calls for speculation.
80:25	81:13	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (FRE 106); lacks foundation/ personal knowledge (FRE 601, 602).

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
88:11	88:16	Hearsay (801, 802); lacks foundation/ personal knowledge and is vague and ambiguous ("we did not feel it was appropriate...")
92:21	92:23	Improper designation of counsel objection
93:3	93:6	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); hearsay (801, 802)
93:13	93:18	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); relevance (401-403); hearsay (801, 802)
93:21	94:16	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); relevance (401-403); hearsay (801, 802)
108:8	108:9	Not a valid counter-designation for completeness or fairness purposes (FRE 106).
108:15	109:14	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); improper opinion (701, 702); hearsay (801, 802); vague and ambiguous; more prejudicial than probative/ waste of time (401-403).
110:3	110:5	
129:4	129:5	Improper designation of counsel objection
130:1	130:2	Improper designation of counsel objection
132:8	132:9	Improper designation of counsel objection

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
149:13	149:14	Improper designation of counsel objection
154:1	155:6	Not a valid counter-designation for completeness or fairness purposes (FRE 106)
184:25	185:11	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); calls for speculation.
185:15	185:23	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); calls for speculation.
186:2	186:8	Not a valid counter-designation and is moreover incomplete on its own because it omits the answer to the question (106); even if it were "complete" by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); lacks foundation (601, 602); calls for speculation.
186:11	186:20	Not a valid counter-designation and is moreover incomplete on its own and out of context (106); includes improper record objections; 401-403 (more prejudicial than probative/ confusion of the issues/ waste of time); calls for speculation; lacks foundation/ personal knowledge (601, 602).
200:6	200:20	This is not a valid counter- designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106).
200:23	201:25	This is not a valid counter- designation, as neither completeness nor fairness requires that this designation be considered

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
		contemporaneously with the designated content (106); 801, 802, 701, 702, Lacks foundation (601, 602)
202:12	203:3	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); hearsay
203:8	203:18	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); further, it is in and of itself incomplete, as it omits the answer to the designated question on line 19 (106).
203:20	204:4	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); improper opinion (701, 702).
204:7	204:23	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); improper opinion (701, 702)
206:19	207:4	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); lacks foundation / personal knowledge (601, 602).



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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
208:7	208:12	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); 601, 602, calls for speculation.
211:22	212:15	First off, this is out-of-context and incomplete in and of itself (106); second, even if it were "complete" by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); lacks foundation/ personal knowledge (601, 602); speculation/ vague and ambiguous.
214:10	215:9	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); hearsay (801, 802); lacks foundation / personal knowledge (601, 602).
216:1	216:7	This is not a valid counter-designation to any of the content affirmatively designated (106); hearsay (801, 802); lacks foundation (601, 602).